

In the Matter Of:

FAIR ISAAC CORPORATION

vs

FEDERAL INSURANCE COMPANY

HENRY MIROLYUZ

July 31, 2018

<p style="text-align: right;">Page 58</p> <p>1 from Tony Zhang to a number of people?</p> <p>2 A. Correct.</p> <p>3 Q. Dated May 5, 2011?</p> <p>4 A. That is correct.</p> <p>5 Q. Okay. Re: WorkManager design</p> <p>6 documents. Okay.</p> <p>7 If you would help me identify the people</p> <p>8 first. Svjetlana, the first person, Golubovic</p> <p>9 G-O-L-U-B-O-V-I-C, that person is -- who is that?</p> <p>10 A. I recall that she is a developer on</p> <p>11 Canadian IT team.</p> <p>12 Q. Okay. Zorica Todorovic?</p> <p>13 A. She is CIO of Canadian IT organization.</p> <p>14 Q. Chief operating officer?</p> <p>15 A. Chief information officer.</p> <p>16 Q. Chief information officer Canada. Okay.</p> <p>17 Marina Maevska?</p> <p>18 A. Marina Maevska is, if I recall, she was</p> <p>19 part of the IT team. I don't recall her exact role,</p> <p>20 in the developer or business analyst in Canada.</p> <p>21 Q. In Canada. All right.</p> <p>22 Then under the ccs, Jack Wong.</p> <p>23 A. Yep. He is -- was developer on the</p> <p>24 Canadian IT team.</p> <p>25 Q. Lei Lan, L-A-N?</p>	<p style="text-align: right;">Page 60</p> <p>1 MR. FLEMING: Thank you.</p> <p>2 Q. "Blaze will be used as rules engine and</p> <p>3 will be installed on one of Toronto application</p> <p>4 servers."</p> <p>5 Do you know what that means?</p> <p>6 A. That they are planning to use the rules</p> <p>7 engine as a part of this application. However, it</p> <p>8 does not tell if it was or was not implemented.</p> <p>9 Q. And the rules engine is a reference to</p> <p>10 Blaze Advisor software?</p> <p>11 A. That is correct.</p> <p>12 Q. Do you know that the Blaze Advisor</p> <p>13 software installed on servers in Canada was installed</p> <p>14 on servers located in Toronto, Canada?</p> <p>15 A. I do not know. And judging by this</p> <p>16 e-mail, I can't say if it was or was not.</p> <p>17 Q. Okay. Do you know from your interviews</p> <p>18 in preparing for the deposition whether Blaze Advisor</p> <p>19 software in Canada was installed on servers located</p> <p>20 in different locations?</p> <p>21 A. I know based on my conversation that was</p> <p>22 installed on servers located in Canada. But however,</p> <p>23 location, exact location, I'm not aware of those.</p> <p>24 Q. And whether that exact location was in</p> <p>25 one city or more than one city, you also don't know?</p>
<p style="text-align: right;">Page 59</p> <p>1 A. Same thing. She is a member of the IT</p> <p>2 team implementing the WorkManager.</p> <p>3 Q. In Canada?</p> <p>4 A. In Canada.</p> <p>5 Q. And then Andy Kim?</p> <p>6 A. Same as the above.</p> <p>7 Q. And when you use the name WorkManager,</p> <p>8 what is that?</p> <p>9 A. I don't know that. Judging by the</p> <p>10 e-mails, it's the application, but I don't know what.</p> <p>11 MR. FLEMING: I object, lack of</p> <p>12 foundation.</p> <p>13 Q. And do you know if WorkManager is an</p> <p>14 application -- do you know if WorkManager used Blaze</p> <p>15 Advisor?</p> <p>16 MR. FLEMING: Same objection.</p> <p>17 A. I don't.</p> <p>18 Q. So when the -- under highlights, there's</p> <p>19 a sentence, "Blaze will be used as rules engine and</p> <p>20 will be installed on one of Toronto application</p> <p>21 servers."</p> <p>22 MR. FLEMING: Where are you reading that</p> <p>23 from?</p> <p>24 MR. HINDERAKER: Fifth line down under</p> <p>25 highlights.</p>	<p style="text-align: right;">Page 61</p> <p>1 A. I don't know.</p> <p>2 (Exhibit 10, E-Mail Chain, marked for</p> <p>3 identification, as of this date.)</p> <p>4 Q. Can we agree that Exhibit 10 is an</p> <p>5 e-mail from yourself to Tony Zhang with a copy to</p> <p>6 Patrick Sullivan dated November 15, 2011?</p> <p>7 A. Correct.</p> <p>8 Q. Who is Patrick F. Sullivan?</p> <p>9 A. Patrick F. Sullivan at the point of</p> <p>10 writing this e-mail was the chief enterprise</p> <p>11 architect for the job.</p> <p>12 Q. Is that a position to which you</p> <p>13 reported?</p> <p>14 A. Yes. I would report directly to him.</p> <p>15 Q. Are you telling Mr. Zhang that he can</p> <p>16 download Blaze Advisor 7.0 from the internal web --</p> <p>17 internal Chubb website to be installed on servers in</p> <p>18 Canada?</p> <p>19 A. Correct.</p> <p>20 Q. Is it true as it was with the U.K., that</p> <p>21 whatever applications were developed for use in</p> <p>22 Canada that deployed Blaze Advisor, those</p> <p>23 applications were also residing on Canadian servers?</p> <p>24 A. I cannot say one way or another. In</p> <p>25 Canada, I specifically have this information that</p>

<p style="text-align: right;">Page 62</p> <p>1 were resided in Canada. I mean, in UZEB (sic) or for 2 Canada, if they resided in Canada or U.S. servers, I 3 don't have that -- I cannot confirm it one way or 4 another. 5 Q. From your knowledge and your interviews, 6 what reason would the insurance companies in Canada 7 have to install Blaze Advisor software on servers 8 located in Canada? 9 A. That only reason I would think if they 10 have is the geographical location and latency 11 associated with that. 12 Q. And you were using the word latency? 13 A. Ability to exit the application over the 14 network. Speed of access. 15 Q. Speed of access? 16 A. Proximity provides better access. 17 Q. Understood. 18 What I'm asking you is -- I'll phrase it 19 this way; we agree that Blaze Advisor software was 20 installed and was installed on servers in Canada, 21 agreed? 22 MR. FLEMING: Asked and answered. 23 MR. HINDERAKER: Agreed, asked and 24 answered. 25 A. Yeah.</p>	<p style="text-align: right;">Page 64</p> <p>1 A. Dali Yang is -- was one of the 2 developers or part of the IT team implementing or 3 involved on the project using the Blaze Advisor. 4 Q. Okay. Implementing -- what did you say? 5 A. Implementing projects used in the Blaze 6 Advisor software. 7 Q. In the second paragraph, where he is 8 saying "We had another small project became the first 9 Blaze implementation in CAZ," do you know what that 10 project's name is? 11 A. The only thing I can say, judging by the 12 attachment name of the subject of the e-mail, it says 13 CSI private company project. 14 Q. Okay. And CAZ, does that stand for the 15 Canadian zone? 16 A. Yeah, correct. 17 Q. Do you know the geographical scope of 18 the Canadian zone? 19 A. I don't. I assume it's Canada. 20 MR. MURPHY: Don't assume. 21 Q. Me, too. 22 (Exhibit 12, E-Mail Chain, marked for 23 identification, as of this date.) 24 Q. And can we agree that Exhibit 12 is an 25 e-mail from yourself to Tony Zhang, subject: Blaze</p>
<p style="text-align: right;">Page 63</p> <p>1 Q. And do you know how the Blaze Advisor 2 software installed on servers in Canada was used? 3 A. It was, to my knowledge, it was used as 4 the part of the applications which is one of the 5 exhibits. I don't recall the name. 6 Q. And as being used as part of an 7 application, that application was also residing on 8 Canadian servers? 9 A. This again, I would not confirm one way 10 or another. Components can be located in a different 11 server so if application was located servers in 12 Canada or U.S. I cannot say. 13 Q. You don't know? 14 A. I don't know. 15 MR. FLEMING: So asked and answered a 16 couple of times now. Same question. 17 MR. HINDERAKER: Thank you. 18 (Exhibit 11, E-Mail dated June 18, 2012, 19 marked for identification, as of this date.) 20 Q. Can we agree that Exhibit 11 is an 21 e-mail from Tony Zhang to yourself and others, 22 subject: Blaze rules review CSI private company 23 project dated June 18, 2012? 24 A. Correct. 25 Q. Who is Dali Yang?</p>	<p style="text-align: right;">Page 65</p> <p>1 upgrade to 7.1 dated June 7, 2013? 2 A. Correct. 3 Q. And why, do you recall, did you advise 4 Mr. Zhang that Blaze 7.1.1 is the standard version of 5 Blaze to use? 6 A. By the enterprise standard, 7 architectural standard, software versions should be 8 uniform across the company. Thus, known Tony 9 involvement into the Blaze project, advising him that 10 the new version been released and used as the 11 enterprise standard now. 12 Q. And do you know that -- perhaps separate 13 from this e-mail, do you know that in Canada, Blaze 14 7.1.1 was installed on Canadian servers? 15 A. I don't know. My role was to provide 16 the information to him. It was up to him to -- what 17 to do with this information. 18 Q. So whether he did or did not, you don't 19 know one way or the other? 20 MR. FLEMING: Objection, asked and 21 answered. 22 A. I don't know. 23 Q. If you could find Exhibit 6 in your 24 stack. Do you have it? 25 A. I do.</p>